

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
Irving H. Picard
David J. Sheehan
Seanna R. Brown
Heather R. Wlodek

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM DECEMBER 1, 2021 THROUGH MARCH 31, 2022**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff
Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll
and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On July 1, 2022, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from December 1, 2021 through March 31, 2022 (the “Fee Applications”). These Fee Applications include the following:

- A. Thirty-Ninth Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2021 through March 31, 2022 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 12/1/2021 to 3/31/2022, fee: \$35,682,411.60, expenses: \$488,259.37 (Filed: 7/1/2022) [ECF No. 21842]
- B. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Schiltz & Schiltz, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$80,477.40, expenses: \$15,217.29 (Filed: 7/1/2022) [ECF No. 21843]
- C. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Soroker Agmon Nordman, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$477,580.31, expenses: \$861.35 (Filed: 7/1/2022) [ECF No. 21844]
- D. Thirty-Eighth Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2021 through March 31, 2022 and Request for Partial Release of Holdback for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 12/1/2021 to 3/31/2022 fee: \$2,648,805.00, expenses: \$ 8,255.93 (Filed: 7/1/2022) [ECF No. 21845]
- E. Application of Graf & Pitkowitz Rechtsanwälte GmbH as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Period (Filed: 7/1/2022) [ECF No. 21846]

- F. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Browne Jacobson, LLP, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$136,679.24, expenses: \$3,302.54 (Filed: 7/1/2022) [ECF No. 21847]
- G. Application of Eugene F. Collins as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Periods filed by Eugene F. Collins, Special Counsel (Filed: 7/1/2022) [ECF No. 21848]
- H. Application of Velitor Law as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Periods filed by Velitor Law, Special Counsel (Filed: 7/1/2022) [ECF No. 21849]
- I. Final Application of Munari Giudici Maniglio Panfili E Associati as Special Counsel to the Trustee for Release of Fees Held Back filed by Munari Giudici Maniglio Panfili E Associati, Special Counsel (Filed: 7/1/2022) [ECF No. 21850]
- J. Application of UGGC & Associés as Special Counsel to the Trustee for Allowance of Interim Compensation Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for UGGC & Associates, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$23,338.28, expenses: \$0.00 (Filed: 7/1/2022) [ECF No. 21851]
- K. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Monfrini Bitton Klein, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$16,966.37, expenses: \$0.00 (Filed: 7/1/2022) [ECF No. 21852]
- L. Thirty-Fourth Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$414,213.57, expenses: \$8,379.84 (Filed: 7/1/2022) [ECF No. 21853]
- M. Final Application of Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of Fees Held Back for Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP, Special Counsel, period:

12/1/2021 to 3/31/2022, fee: \$10,673.10, expenses: \$114.69 (Filed: 7/1/2022)
[ECF No. 21854]

- N. Second Application of Bowman and Brooke, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Bowman and Brooke, Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$6,398.04, expenses: \$1,366.10 (Filed: 7/1/2022) [ECF No. 21855]
- O. Second Application of Lukins & Annis, P.S. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2021 through March 31, 2022 and for Release of a Portion of Fees Held Back for Lukins & Annis P.S., Special Counsel, period: 12/1/2021 to 3/31/2022, fee: \$9,928.80, expenses: \$1,155.94 (Filed: 7/1/2022) [ECF No. 21856]
- P. Application of The Scaletta Law Firm, PLLC as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Periods filed by The Scaletta Law Firm, PLLC (Filed: 7/1/2022) [ECF No. 21857]

2. The deadline for filing objections to the Fee Applications expired on July 27, 2022 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for August 10, 2022 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no

party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the “Order”) that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: August 1, 2022
New York, New York

By: /s/ David J. Sheehan
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Tel: (212) 589-4200
Fax: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Seanna R. Brown
Email: sbrown@bakerlaw.com
Heather R. Wlodek
Email: hwlodek@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*